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*Attorneys for Defendants SMART Technologies Inc.,  
 David A. Martin, Nancy L. Knowlton, G.A. Fitch,  
 Salim Nathoo, Arvind Sodhani, and Apax Partners*

[Counsel for Additional Parties  
 Listed on Signature Page]

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

THOMAS E. HARPER and DIANE KEENE,  
 Individually and On Behalf of All Others  
 Similarly Situated,  
  
 Plaintiffs,

vs.

SMART TECHNOLOGIES, INC., DAVID A.  
 MARTIN, NANCY L. KNOWLTON, G.A.  
 FITCH, SALIM NATHOO, ARVIND  
 SODHANI, INTEL CORPORATION, APAX  
 PARTNERS, MORGAN STANLEY & CO.  
 INC., DEUTSCHE BANK AG, and RBC  
 DOMINION SECURITIES INC,

Defendants.

Case No. 11 CV 5232 (SBA)

Assigned to: Hon. Sandra Brown Armstrong

**STIPULATION EXTENDING TIME FOR  
 BRIEFING ON PLAINTIFFS' MOTION TO  
 REMAND AND DEFENDANTS' MOTION  
 TO TRANSFER THIS ACTION OR IN THE  
 ALTERNATIVE DISMISS OR STAY THIS  
 ACTION AND STRIKE THE CLASS  
 ALLEGATIONS**



Pursuant to Civil Local Rule 6-1(a), Defendants SMART Technologies Inc., David A. Martin, Nancy L. Knowlton, G.A. Fitch, Salim Nathoo, Arvind Sodhani, Intel Corporation, Apax Partners, Morgan Stanley & Co. LLC (f/k/a Morgan Stanley & Co. Inc.), Deutsche Bank AG, and RBC Dominion Securities Inc. ("Defendants"), and Plaintiffs Thomas E. Harper and Dianne Keene ("Plaintiffs"), by and through their respective counsel of record, hereby submit the following stipulation.

WHEREAS, on November 8, 2011, Defendants filed a Motion to Transfer this action or in the alternative Dismiss or Stay this action and Strike the Class Allegations ("Defendants' Motion");

WHEREAS, Plaintiffs intend to oppose Defendants' Motion;

WHEREAS, on November 9, 2011, Plaintiffs filed a Motion to Remand this action ("Plaintiffs' Motion");

WHEREAS, Defendants intend to oppose Plaintiffs' Motion;

WHEREAS, the Local Rules for the Northern District of California require that, unless otherwise ordered, Defendants' Motion would be fully briefed by November 29, 2011 and that Plaintiffs' Motion would be fully briefed by November 30, 2011;

WHEREAS, Plaintiffs and Defendants have conferred about establishing a more flexible schedule for completing briefing on their respective Motions;

THEREFORE, Plaintiffs and Defendants, by and through their respective counsel, hereby stipulate as follows:

1. Plaintiffs and Defendants shall file their respective opposition papers in response to the Motions by December 2, 2011.
2. Plaintiffs and Defendants shall file their respective reply papers in support of the Motions by December 16, 2011.

The requested extension will not alter the date of any event or any deadline already fixed by any Court order.



1 DATED: November 18, 2011

SIDLEY AUSTIN LLP

2 By: /s/ Sara B. Brody  
3 Sara B. Brody

4 Attorneys for Defendants SMART  
5 TECHNOLOGIES INC., DAVID A. MARTIN,  
6 NANCY L. KNOWLTON, G.A. FITCH,  
7 SALIM NATHOO, ARVIND SODHANI, and  
8 APAX PARTNERS

9 DATED: November 18, 2011

GIBSON, DUNN & CRUTCHER LLP

10 By: /s/ Paul J. Collins  
11 Paul J. Collins

12 Attorneys for Defendant  
13 INTEL CORPORATION

14 DATED: November 18, 2011

MILBANK, TWEED, HADLEY  
& MCCLOY LLP

15 By: /s/ Jerry L. Marks  
16 Jerry L. Marks

17 Attorneys for Defendants MORGAN  
18 STANLEY & CO. INC., DEUTSCHE BANK  
19 SECURITIES, INC., and RBC DOMINION  
20 SECURITIES

21 DATED: November 18, 2011

SCOTT & SCOTT LLP

22 By: /s/ Anne L. Box  
23 Anne L. Box

24 Attorneys for Plaintiffs  
25 THOMAS E. HARPER and DIANNE KEENE  
26  
27  
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**SIGNATURE ATTESTATION**


Pursuant to General Order No. 45(X)(B), I hereby attest that I have on file written permission to sign this joint motion from all parties whose signatures are indicated by a conformed signature (/s/) within this e-filed document.

/s/ Sara B. Brody

**O R D E R**

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

DATED: \_\_11/28/11

  
The Honorable Sandra Brown Armstrong  
United States District Court